

**FOURTEENTH COUNT - FALSE ARREST ON**

**BEHALF OF DONNA SPARKS**

94. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 93 as though fully set forth herein at length;
95. This plaintiff was, without cause or provocation, falsely arrested;
96. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
97. This plaintiff intends to claim punitive damages for all counts;
98. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**FIFTEENTH COUNT - NEGLIGENT TREATMENT**

**ON BEHALF OF DONNA SPARKS**

99. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 98 as though fully set forth herein at length;
100. This plaintiff was negligently treated by various members of the "POLICE" of the defendant "CITY", including the defendants herein;
101. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
102. This plaintiff intends to claim punitive damages for all count
103. As a result of the foregoing, this plaintiff has been damaged in a sum within the

jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**SIXTEENTH COUNT - INVASION OF PRIVACY ON  
BEHALF OF DONNA SPARKS**

104. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 103 as though fully set forth herein at length;
105. The aforementioned occurrence constituted an invasion of privacy of this plaintiff;
106. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
107. This plaintiff intends to claim punitive damages for all counts;
108. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**SEVENTEENTH COUNT - CIVIL RIGHTS VIOLATION ON  
BEHALF OF DONNA SPARKS**

109. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 108 as though fully set forth herein at length;
110. As a result of the aforementioned occurrence this plaintiff was deprived of her civil rights under the Constitution of the United States and the Constitution of the State of New York as well as other State ordinances, statutes, codes, and rules, including but not limited to 42USC §1981, §1983, §1985, §1988 and 28USC §1343;

- 111. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
- 112. This plaintiff intends to claim punitive damages for all counts;
- 113. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**EIGHTEENTH COUNT NEGLIGENCE ON  
BEHALF OF DONNA SPARKS**

- 114. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 113 as though fully set forth herein at length;
- 115. The aforementioned occurrence took place as a result of the negligence of the defendants including but not limited in the defendant "CITY"'s negligent hiring practice of its' employees including the defendants herein;
- 116. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
- 117. This plaintiff intends to claim punitive damages for all counts;
- 118. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**NINETEENTH COUNT - PRIMA FACIE TORT  
ON BEHALF OF DONNA SPARKS**

- 119. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 118 as though fully set forth herein at length;
- 120. The defendants, without justification, intentionally acted to physically and emotionally harm this plaintiff,
- 121. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
- 122. This plaintiff intends to claim punitive damages for all counts;
- 123. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New York and in excess of the jurisdictional limits of all inferior Courts;

**TWENTIETH COUNT - BATTERY ON**

**BEHALF OF DONNA SPARKS**

- 124. This plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 123 as though fully set forth herein at length;
- 125. This plaintiff, without cause, provocation or justification, was brutally battered by the police officers at the scene, including but not limited to the defendants;
- 126. As a result of the foregoing, this plaintiff suffered physical injuries, severe emotional trauma, feared for her life, and sustained severe and other consequential damages;
- 127. This plaintiff intends to claim punitive damages for all counts;
- 128. As a result of the foregoing, this plaintiff has been damaged in a sum within the jurisdictional limits of the United States District Court, Southern District of New